

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

|                                   |   |                        |
|-----------------------------------|---|------------------------|
| HONEYWELL INTERNATIONAL INC. and  | ) |                        |
| HONEYWELL INTELLECTUAL PROPERTIES | ) |                        |
| INC.,                             | ) |                        |
|                                   | ) |                        |
| Plaintiff,                        | ) | C.A. No. 04-1338 (KAJ) |
|                                   | ) |                        |
| v.                                | ) |                        |
|                                   | ) |                        |
| APPLE COMPUTER, INC., et al.,     | ) |                        |
|                                   | ) |                        |
| Defendants.                       | ) |                        |

**DECLARATION OF MICHAEL D. OKERLUND**

I, Michael D. Okerlund, declare:

1. I am an attorney with the law firm of Robins, Kaplan, Miller & Ciresi L.L.P., representing plaintiffs Honeywell International Inc. and Honeywell Intellectual Properties Inc. ("Honeywell") in the above-captioned matter. I make this declaration in support of Honeywell's Opposition to Defendant ST-LCD's Motion to Dismiss For Lack of Personal Jurisdiction.

2. It is my understanding that prior to filing suit in this matter, Honeywell purchased in the state of Delaware a number of consumer electronics products manufactured by Sony Corporation ("Sony"). Those purchases were made at national consumer electronics stores.

3. After the Sony consumer electronics products were purchased, those products were subsequently "torn down" or disassembled by certain Honeywell employees. Some of those disassembled products were found to contain LCD modules manufactured by ST-Liquid Crystal Display ("ST-LCD") that appear to infringe the patent-in-suit. For example, on April 4, 2004, a Sony camera found to contain an ST-LCD module was purchased at the Circuit

City, store located at 4130 Concord Pike, Wilmington, Delaware. A copy of the receipt for that transaction is included as Exhibit K to the Affidavit of Michael D. Okerlund in Support of Plaintiffs' Opposition to ST-LCD's Motion to Dismiss for Lack of Personal Jurisdiction, filed herewith.

4. Honeywell employees also purchased in the state of Delaware a number of other consumer electronics products manufactured by companies other than Sony. These products were also disassembled by Honeywell employees and some were found to contain infringing LCD modules manufactured by ST-LCD. For example, on April 22, 2004, Honeywell purchased a product containing an ST-LCD module from the Ritz Camera store located at 108 W. 9th St., Wilmington, Delaware. A copy of the receipt for that transaction is included as Exhibit L to the Affidavit of Michael D. Okerlund in Support of Plaintiffs' Opposition to ST-LCD's Motion to Dismiss for Lack of Personal Jurisdiction, filed herewith. Still other products found to contain ST-LCD modules were purchased at CompUSA located at 4211 Concord Avenue, Wilmington, Delaware. Those products were subsequently shipped by CompUSA into Wilmington, Delaware. *See* Ex. J, L.

I declare under penalty of perjury that the foregoing is true and correct.

February 27, 2006

  
Michael D. Okerlund

**CERTIFICATE OF SERVICE**

I hereby certify that on February 27, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing to the following: John R. Alison, Parker H. Bagley, Robert J. Benson, Robert Karl Beste, III, Elizabeth L. Brann, Christopher E. Chalsen, Arthur G. Connolly, III, Frederick L. Cottrell, III, Francis DiGiovanni, Thomas M. Dunham, Amy Elizabeth Evans, York M. Faulkner, Christopher J. Gaspar, Alexander E. Gasser, Alan M. Grimaldi, Thomas C. Grimm, Thomas Lee Halkowski, Richard L. Horwitz, Robert J. Katzenstein, Nelson M. Kee, Richard D. Kelly, Stephen S. Korniczky, Hamilton Loeb, David J. Margules, David Ellis Moore, Carolyn E. Morris, Arthur I. Neustadt, Elizabeth A. Niemeyer, Gerard M. O'Rourke, Andrew M. Ollis, Karen L. Pascale, Adam Wyatt Poff, Leslie A. Polizoti, Alana A. Prills, Steven J. Rizzi, Avelyn M. Ross, Philip A. Rovner, Carl E. Schlier, John M. Seaman, Chad Michael Shandler, John W. Shaw, William J. Wade, Roderick B. Williams and Edward R. Yoches.

I further certify that I caused true and correct copies of the foregoing to be served on the following in the manner indicated:

**BY HAND**

John W. Shaw  
YOUNG CONAWAY STARGATT & TAYLOR, LLP  
The Brandywine Building, 17<sup>th</sup> Floor  
1000 West Street  
Wilmington, DE 19801

**BY FEDERAL EXPRESS**

John Flock  
KENYON & KENYON LLP  
One Broadway  
New York, NY 10004

/s/ Leslie A. Polizoti (#4299)

MORRIS, NICHOLS, ARSHT & TUNNELL LLP  
1201 North Market Street  
Wilmington, DE 19801  
(302) 658-9200  
lpolizoti@mnat.com